

UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

UNITED STATES OF AMERICA,
Plaintiff

v.

GYEONG JEI LEE,
Defendant.

CASE NO.

COMPLAINT

Title 49, United States Code,
Sections 46504 and 46506, and Title 18,
United States Code, Section 113

BEFORE United States Magistrate Judge John L. Weinberg, Seattle, Washington.

The undersigned complainant being duly sworn states:

Count 1

(Interference with Flight Crew Members and Attendants)

On or about September 24, 2020, in the Western District of Washington, and elsewhere, the Defendant GYEONG JEI LEE, on an aircraft in flight in the special aircraft jurisdiction of the United States, namely Korean Airlines Flight KE19 bound from Seoul Incheon Airport in South Korea to Seattle-Tacoma International Airport in SeaTac, Washington, did knowingly interfere, and attempt to interfere, with the

1 performance of the duties of flight attendants of the aircraft, and lessen the ability of the
2 attendants to perform those duties, by assaulting and intimidating the flight attendants.

3 All in violation of Title 49, United States Code, Section 46504.

4 **Count 2**

5 **(Assault Within the Special Aircraft Jurisdiction of the United States)**

6 On or about September 24, 2020, in the Western District of Washington, and
7 elsewhere, the Defendant, GYEONG JEI LEE, on an aircraft in flight in the special
8 aircraft jurisdiction of the United States, namely, Korean Airlines Flight KE19 bound
9 from Seoul Incheon Airport in South Korea to Seattle-Tacoma International Airport in
10 SeaTac, Washington, did intentionally assault passenger E.P. by striking, beating, and
11 wounding E.P.

12 All in violation of Title 18, United States Code, Section 113(a)(4) and Title 49,
13 United States Code, Section 46506.

14
15 And the complainant states that this Complaint is based on the following
16 information:

17 I, Caryn J. Highley, being first duly sworn on oath, hereby depose and state as
18 follows:

19 **AFFIANT BACKGROUND**

20 1. I am assigned to the Seattle Division of the Federal Bureau of Investigation
21 (FBI) and am a member of the Seattle Safe Streets Task Force (SSSTF), which focuses
22 on gang-related, violent crimes, as well as Organized Crime Drug Enforcement Task
23 Force matters. I am a law enforcement officer currently authorized to investigate and
24 enforce violations of federal criminal statutes, including those found in Title 18, 21 and
25 49 of the United States Code. I have received basic law enforcement training at the 20-
26 week FBI Academy. This training focused on various aspects of conducting criminal
27 enterprise investigations such as interviewing and interrogation techniques, physical and
28

1 electronic surveillance, development and management of confidential human sources,
2 and arrest planning and execution.

3 2. The facts in this affidavit come from my personal observations, training and
4 experience, and information obtained from other law enforcement officers and witnesses.

5 3. This affidavit is submitted for the limited purpose of establishing probable
6 cause to believe that Defendant, GYEONG JEI LEE, has committed the offense of
7 Interference with Flight Crew Members and Attendants, in violation of Title 49, United
8 States Code, Section 46504 and Assault Within the Special Aircraft Jurisdiction of the
9 United States, in violation of Title 18, United States Code, Section 113(a)(4) and Title 49,
10 United States Code, Section 46506. I have not included every fact concerning this
11 investigation. Rather, I have set forth the facts that I believe are necessary for a fair
12 determination of probable cause.

13 4. This complaint is being presented electronically pursuant to Local Criminal
14 Rule CrR 41(d)(3).

15 **SUMMARY OF PROBABLE CAUSE**

16 5. On September 24, 2020, shortly after 4:30 p.m., Korean Airlines flight
17 KE19 departed from Seoul Incheon International Airport bound for Seattle-Tacoma
18 International ("SeaTac") Airport.¹ GYEONG JEI LEE, a resident of Aurora, Colorado,
19 boarded this flight after visiting family in South Korea. Although LEE was assigned a
20 seat near the front of the aircraft, because the flight was relatively empty, he relocated to
21 a preferred seat near the back of the plane during flight. The flight, which was roughly
22 nine hours long, departed from South Korea, traversed the Pacific Ocean and landed at
23 SeaTac Airport at approximately 9:50 a.m.

24 6. Approximately one hour before landing, while the plane was over the North
25 Pacific Ocean, west of Seattle, Washington, LEE asked a flight attendant to provide him
26 with a metal hairpin. LEE used this hairpin to open the SIM card tray on his cellular
27

28

¹ Sea-Tac Airport is located in SeaTac, Washington, within King County.
COMPLAINT / *U.S. v. Lee* - 3

1 device. Shortly after obtaining this hairpin, which was approximately 5 inches long (2 ½
2 inches per side bent in half) and had sharp metal points at the ends, LEE began
3 threatening flight attendants and passengers onboard the plane.

4 7. Approximately forty minutes before landing, LEE placed a plastic shopping
5 bag over his head, to which he added breathing holes. With the plastic bag on his head,
6 LEE rose from his seat, armed with the sharp hairpin. Standing in the rear of the aircraft,
7 LEE threatened Flight Attendants J.K. and J.L. LEE lunged at Flight Attendant J.K.,
8 holding the hairpin in his hand, and demanded that J.K. call the cockpit so he could speak
9 with the plane's Captain. While making these demands, LEE waived the hairpin around
10 like a weapon. LEE also held the hairpin up to Flight Attendant J.L.'s face, threatening
11 to kill J.L. and the other flight attendants. Specifically, LEE told the flight attendants
12 "Who are you? Go that way. I will kill all of you," "don't move," and "never say
13 anything." After demanding to speak to the Captain, LEE ordered the two flight
14 attendants to their knees and continued threatened them. The flight attendants complied,
15 and J.L. explained she was fearful for her safety.

16 8. After threatening J.K. and J.L., LEE quickly traveled to the front of the
17 aircraft where the cockpit was located. While at the front of the plane, LEE encountered
18 another flight attendant, who LEE shouted at in Korean, and she tried to prevent LEE
19 from approaching the cockpit. Unable to stop LEE, the flight attendant asked Passenger
20 E.P., seated in seat 7A near the front of the aircraft, for help. After noticing that LEE was
21 visibly angry, E.P. attempted, unsuccessfully, to calm LEE down. When LEE began
22 kicking and yanking on the cockpit door, E.P. tried to physically restrain LEE. A
23 confrontation ensued, during which LEE punched E.P. in the torso.

24 9. Reserve Pilot H.K., who was resting in the plane's main cabin, went to the
25 front of the aircraft after hearing a disturbance in the first class galley. When H.K.
26 approached, LEE was kicking the cockpit door. LEE then announced that he had a bomb
27 and demanded that the plane be diverted to land in Vancouver, Canada. H.K. attempted
28 to speak to LEE, in order deescalate the threat, and LEE again informed H.K. that he had

1 a bomb. According to witnesses, LEE yelled in both Korean and English that he had a
2 bomb and claimed that everyone was going to die.

3 10. Flight attendants notified Pilot Captain H.K.O., who was also resting in the
4 main cabin area of the aircraft, about the disturbance onboard. As H.K.O. responded to
5 the front of the aircraft, Passenger E.P. and a flight attendant tried to encourage LEE to
6 move towards the back of the aircraft. H.K.O. then saw LEE run towards the front of the
7 plane and begin screaming, cursing, and kicking the cockpit door. H.K.O. asked Flight
8 Attendant N.J.P. to gather additional passengers to help subdue LEE, and instructed
9 N.J.P. to locate the Taser that the flight crew kept onboard. After N.J.P. obtained the
10 Taser, LEE became agitated, threatening to kill N.J.P. while running towards her.
11 Believing that LEE may kill her, N.J.P. fired the Taser, which struck LEE, among other
12 places, in the jaw. After N.J.P. fired the Taser, the captains, passengers and other flight
13 attendants physically subdued LEE and placed him in restraints. For the remainder of the
14 flight, multiple individuals onboard the plane restrained LEE until they safely landed at
15 Sea-Tac Airport.

16 11. At approximately 9:50 a.m., the flight landed at Sea-Tac Airport, where
17 Port of Seattle Police Department (POSPD) officers boarded the plane and took LEE into
18 custody. After LEE was removed from the flight, during interviews, multiple flight crew
19 members stated they feared for their lives because they saw LEE using significant force
20 to attempt to open the cockpit door and believed he may have a bomb.

21 12. While being examined by Port of Seattle Medics, LEE reported that he took
22 lithium for bi-polar disorder and appeared to be exhibiting manic behavior. As a result of
23 the incident, LEE sustained a small laceration to his face and had marks on his ankles, but
24 did not need immediate medical assistance.

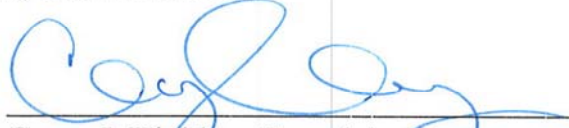
25 13. LEE was escorted off the plane and taken into Customs and Board
26 Protection (CBP) area for processing and interview. When speaking with law
27 enforcement, LEE admitted to threatening the flight crew. LEE explained that he used a
28 hairpin, obtained from a flight attendant, to threaten the crew, demanding that the plane

1 be redirected to land in Vancouver, Canada. LEE stated “I wanted to go to Vancouver
2 for a vacation, I have never been there.” When asked about the hairpin, LEE noted “I
3 wanted to hurt them, but I didn’t.” LEE admitted that what he did was “wrong.” LEE
4 went on to express concern that Colorado law enforcement officers had placed satellites
5 around his home and business, spying on him and his family since 2010. LEE stated he
6 had received mental health treatment at a Korean hospital in or around 2010. LEE
7 explained that he was prescribed medication, believed to be an anti-psychotic based on
8 statements made to medical personnel, and had taken this medication the night before the
9 flight (September 23, 2020) an again in the presence of law enforcement on September
10 24, 2020. LEE stated he took this medication daily.² LEE was taken to the hospital,
11 where he was cleared by medical personnel, and was arrested.

26
27 ² I have since spoken to LEE’s family, who informed me that LEE was previously prescribed Lithium but had been
28 taken off this medication based on his doctor’s recommendation. Beginning in January 2020, and ending in May
2020, LEE was tapered off of Lithium and started taking an alternative medication. LEE then suffered a mental
breakdown, and his doctors attempted to adjust his medication, which LEE refused resulting in LEE flying to South
Korea.

CONCLUSION

14. Based on the above facts, I respectfully submit that there is probable cause to believe that Defendant, GYEONG JEI LEE, did knowingly and intentionally commit the offenses of Interference with Flight Crew Members and Attendants, in violation of Title 49, United States Code, Section 46504, and Assault Within the Special Aircraft Jurisdiction of the United States, in violation of Title 18, United States Code, Section 113(a)(4) and Title 49, United States Code, Section 46506.



Caryn J. Highley, Complainant
Special Agent, Federal Bureau of Investigation

The above-named agent provided a sworn statement attesting to the truth of the contents in the foregoing Complaint and Affidavit. Based on the Complaint and Affidavit, the Court hereby finds that there is probable cause to believe the Defendant committed the offense set forth in the Complaint.

Dated this 25th day of September, 2020.



HON. JOHN L. WEINBERG
United States Magistrate Judge